

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION**

TRAVELPASS GROUP, LLC,
PARTNER FUSION, INC., RESERVATION
COUNTER, LLC

Plaintiffs,

v.

CAESARS ENTERTAINMENT
CORPORATION, CHOICE HOTELS
INTERNATIONAL, INC., HILTON
DOMESTIC OPERATING COMPANY, INC.,
HYATT HOTELS CORPORATION,
MARRIOTT INTERNATIONAL, INC., RED
ROOF INNS, INC., SIX CONTINENTS
HOTELS, INC, WYNDHAM HOTEL
GROUP, LLC

Defendants.

Civil Action No. 5:18-cv-00153-RWS-CMC

**JOINT MOTION TO DISMISS WITH PREJUDICE OF PLAINTIFFS AND HYATT
CORPORATION UNDER FED. R. CIV. P. 41(a)(2) & (c)**

Plaintiffs TravelPass Group, LLC, Partner Fusion, Inc., and Reservation Counter, LLC (“Plaintiffs”) and Defendant and Counterclaimant Hyatt Corporation (“Hyatt”) (collectively, the “Parties”), by and through their respective counsel, hereby seek dismissal with prejudice of certain claims and counterclaims in the above-captioned action (the “Action”).

WHEREAS, the Parties have resolved all differences in the Action;

NOW THEREFORE, the Parties move, pursuant to Federal Rule of Civil Procedure 41(a)(2) and (c), for this Court to order as follows:

1. Plaintiffs’ claims in the Action against Hyatt are dismissed with prejudice;
2. Hyatt’s counterclaims in the Action against Plaintiffs are dismissed with prejudice; and

3. The Parties shall bear their own costs and attorneys' fees in connection with the Action.

A proposed order is attached.

Dated: November 9, 2020

Respectfully submitted,

/s/ Christopher J. Schwegmann

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CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this 9th day of November, 2020.

/s/ *Melissa R. Smith*